

## Mullin, Michelle

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**From:** Williams, Dee (ECY) <dewi461@ECY.WA.GOV>  
**Sent:** Monday, August 18, 2014 10:11 AM  
**To:** Ludwick, Matthew (LNI); Swanson, Nicky (ECY); Morris, Leslie (ECY); Edmonson, Ava (ECY); Hancock, Kevin (ECY); Alvarez, Kirsten (ECY); 'Pudlo, Joseph (WSP)'; Salvi, Albert (ECY); Mullin, Michelle  
**Cc:** Christian, Raymond (LNI); Christian, Cheryl (LNI); 'Fletcher, Gabe (WSP)'  
**Subject:** Butcher's Scrap in Hoquiam  
**Attachments:** BUTCHER'S AERIAL.docx; Butcher's data.xlsx

Hi everyone. I have a couple of documents for our meeting:

- 1.) Aerial photos from Bing. Not necessarily fantastic, but perhaps helpful in understanding proximity to Grays Harbor (due south about 500yds), the Grays Harbor Wildlife Refuge, residential areas, Chehalis River, and nearby businesses. The site is located at 1313 Western Ave., Hoquiam if you want to do your own Google/Bing review.
- 2.) Updated data table. The PCB concentrations that were previously reported were skewed high because of data quality challenges. The attached data shows PCB concentrations in soil between 7 and 110ppm. In water (a subsurface weep hole) we have 0.4ppm.

I look forward to our conversation at 1:30. Dee

## Mullin, Michelle

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**From:** Mullin, Michelle  
**Sent:** Wednesday, August 13, 2014 9:24 AM  
**To:** Modjeski, Ronald  
**Subject:** FW: Butcher's Scrap in Hoquium

FYI-  
Call in info below.

Thanks,

### Michelle Mullin

#### PCB Coordinator

US EPA Region 10  
1200 6th Avenue | Suite 900 | OCE-084  
Seattle, WA 98101  
[mullin.michelle@epa.gov](mailto:mullin.michelle@epa.gov)  
206-553-1616  
[www.epa.gov/pcb](http://www.epa.gov/pcb)  
[www.epa.gov/region10/pcb.html](http://www.epa.gov/region10/pcb.html)

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**From:** Williams, Dee (ECY) [<mailto:dewi461@ECY.WA.GOV>]  
**Sent:** Wednesday, August 13, 2014 7:57 AM  
**To:** Mullin, Michelle  
**Subject:** RE: Butcher's Scrap in Hoquium

That'd be great. Thank you. Dee

---

**From:** Mullin, Michelle [<mailto:Mullin.Michelle@epa.gov>]  
**Sent:** Tuesday, August 12, 2014 5:01 PM  
**To:** Williams, Dee (ECY)  
**Subject:** RE: Butcher's Scrap in Hoquium

Thanks, Dee. I spoke to our CID investigator today and he'd like to give this conference call info to the prosecutor, so that he can sit in as well. Do you mind if I share the call-in info with him?

Thanks,

### Michelle Mullin

#### PCB Coordinator

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**From:** Williams, Dee (ECY) [<mailto:dewi461@ECY.WA.GOV>]  
**Sent:** Tuesday, August 12, 2014 1:51 PM

**To:** Mullin, Michelle  
**Subject:** FW: Butcher's Scrap in Hoquium

Here's the call in information. Our meeting is at 1:30. August 18.

---

**From:** Williams, Dee (ECY)  
**Sent:** Tuesday, August 05, 2014 3:59 PM  
**To:** Williams, Dee (ECY); Ludwick, Matthew (LNI); Swanson, Nicky (ECY); Morris, Leslie (ECY); Edmonson, Ava (ECY); Hancock, Kevin (ECY); Alvarez, Kirsten (ECY); 'Pudlo, Joseph (WSP)'; Salvi, Albert (ECY)  
**Cc:** Christian, Raymond (LNI); Christian, Cheryl (LNI)  
**Subject:** RE: Butcher's Scrap in Hoquium

Hi there. If you can make this meeting, please use the following call-in information. Thanks. Dee

The call in number for the conference bridge is: **(360) 407-3780**

**(security code) PIN Code:**     **368599 #**

For State Conference Operators assistance during your call dial 360-902-3310 or \*0 using your Telephone Dialing Pad.  
*State Operators are available only during normal business hours (7:30am-5pm) Monday-Friday*

-----Original Appointment-----

**From:** Williams, Dee (ECY)  
**Sent:** Tuesday, August 05, 2014 11:58 AM  
**To:** Ludwick, Matthew (LNI); Swanson, Nicky (ECY); Morris, Leslie (ECY); Edmonson, Ava (ECY); Hancock, Kevin (ECY); Alvarez, Kirsten (ECY); Pudlo, Joseph (WSP); Salvi, Albert (ECY)  
**Cc:** Christian, Raymond (LNI); Christian, Cheryl (LNI)  
**Subject:** Butcher's Scrap in Hoquium  
**When:** Monday, August 18, 2014 1:30 PM-2:30 PM (UTC-08:00) Pacific Time (US & Canada).  
**Where:** Conf Call

Hi all,

I'm wondering if you'd be available to chime in on a conference call to discuss concerns at Butcher's Scrap and Metal in Hoquiam. We have multiple agencies involved at the site, with a broad range of concerns. We'd like to coordinate and strategize about a way forward.

If you're available, I'll forward a conference call-in number in the next day or so.

Dee Williams

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**To:** Mullin, Michelle  
**Cc:** Morris, Leslie (ECY); Edmonson, Ava (ECY); Swanson, Nicky (ECY)  
**Subject:** FW: Butcher's Data Review  
**Attachments:** Butcher's data.xlsx; Notice-to-Comply.pdf

Great to talk with you. Here's an earlier email articulating our data review. I've also attached my inspection report and immediate action letter. The CID assigned to the case is Ron Modjeski.

In a second email, I'll forward the call-in number for the meeting next Monday.

Thanks again.

Dee

Dee Williams | Hazardous Waste Compliance Unit | Dept of Ecology | HWTR-SWRO  
360.407.6348

---

**From:** Williams, Dee (ECY)  
**Sent:** Wednesday, July 30, 2014 2:24 PM  
**To:** Cason, Joe (ECY); Swanson, Nicky (ECY)  
**Cc:** Morris, Leslie (ECY); Edmonson, Ava (ECY)  
**Subject:** Butcher's Data Review

Hey, I tabled the data that we have so far from Butchers. We're still waiting for the TCLP results.

Here are some conclusions:

- Our data reaffirmed that the site is contaminated. The following constituents were found above the MTCA clean-up level: PCBs, arsenic, cadmium, mercury, lead, benzene and gasoline. PCBs in soil have been found at **over 400x** the MTCA limit. Lead in soil has been found at nearly **100x** the limit.
- Our data confirmed that soil is dangerous waste. Book designation based on the analytical results showed equivalent concentrations that ranged from 0.006 to 0.014%, making the soil in the area of the sample collection to be WT02 dangerous waste. In the area of the rack and south-central yard, the cadmium concentrations alone were high enough to cause the soil to designate as WT02. TCLP analysis will help us further designate the soil.
- The area of the south central yard, near the fence line, carries the greatest concentrations of PCBs, arsenic, cadmium, benzene and other constituents.
- The area of the rack carries the highest concentrations of barium, lead, xylenes and toluene.
- The area of the ditch carries the highest concentration of mercury.
- Our water sample from the southwest corner doesn't book designate as dangerous. However, it is important to note that this water sample (taken from a sub-surface soil pocket, so I'm not sure if it is considered surface water or ground water) is above the MTCA groundwater clean-up standards for PCBs, arsenic, cadmium, chromium and

lead. The PCB concentration was **6000x** higher than the clean up standard. The lead concentration was **almost 160x** higher.

I need to run the data by TCP to make sure I'm referencing the right MTCA numbers, but I'm fairly confident that this is accurate. As referenced in the data table, I used the "Method A Clean up Levels for Groundwater" and the "Method A Soil Cleanup Levels for Unrestricted Land Uses" which I think would be appropriate given the proximity to the Grays Harbor Wildlife Refuge, the nearby estuary, and residential uses.

Just wanted to give you a heads up. Let me know if you have any questions. It'd be great if one of you wanted to double-check the data... let me know.

Thanks. Dee



## Mullin, Michelle

---

**From:** Mullin, Michelle  
**Sent:** Friday, August 08, 2014 9:49 AM  
**To:** Davies, Lauris; McFadden, Kelly  
**Subject:** RE: Butcher's Data Review

Dee is going to call me when she is back in the office next week. I will know more after Tuesday.

Take care,

### Michelle Mullin

#### PCB Coordinator

US EPA Region 10  
1200 6th Avenue | Suite 900 | OCE-084  
Seattle, WA 98101  
[mullin.michelle@epa.gov](mailto:mullin.michelle@epa.gov)  
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**From:** Mullin, Michelle  
**Sent:** Thursday, August 07, 2014 1:21 PM  
**To:** Davies, Lauris; McFadden, Kelly  
**Subject:** RE: Butcher's Data Review

I have left VM and email messages with both Ava and Dee today. Will keep you posted.

Take care,

### Michelle Mullin

#### PCB Coordinator

US EPA Region 10  
1200 6th Avenue | Suite 900 | OCE-084  
Seattle, WA 98101  
[mullin.michelle@epa.gov](mailto:mullin.michelle@epa.gov)  
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---

**From:** Davies, Lauris  
**Sent:** Tuesday, August 05, 2014 9:29 AM  
**To:** Mullin, Michelle; McFadden, Kelly  
**Subject:** FW: Butcher's Data Review

Michelle and Kelly –

Can you follow up with Ava Edmondson to learn more about the issues and this site? K is head of the dangerous waste program, and her voicemail indicated that this site is problematic – they have already done WQ enforcement against the owner. K clearly wants us to do enforcement, but I'm not clear as to whether this is a clean-up site under MTCA (in which case Michelle could provide the State guidance on meeting TSCA requirements) or is truly a candidate for enforcement. Because we've disinvested in PCB enforcement, it is unlikely to get action from us unless we can find another hook (RCRA? CERCLA order?), but before making any determination about EPA engagement, we need more

background than the email string below gives us. Without telling them yes or no on enforcement, can you get a better briefing from the State?

When I replied to K, I got an auto reply saying Ava was out, but I think she is back this week.

Thanks for the followup.

-L

Lauris Davies  
Associate Director  
Office of Compliance and Enforcement  
EPA Region 10  
1200 Sixth Avenue  
Seattle, WA 98103  
(206) 553-2857

---

**From:** Seiler, K (ECY) [<mailto:ksei461@ECY.WA.GOV>]  
**Sent:** Thursday, July 31, 2014 2:51 PM  
**To:** Kowalski, Ed; Davies, Lauris  
**Cc:** Williams, Dee (ECY); Edmonson, Ava (ECY)  
**Subject:** FW: Butcher's Data Review

Hi Ed/Lauris, I left messages just a few minutes ago about this site, and our desire for a TSCA enforcement presence at it. Please take a look at this data, and then either connect with myself, Dee Williams (360 4076348) or Ava Edmonson (360 4076337). This site truly deserves EPA attention. Thanks! K

---

**From:** Williams, Dee (ECY)  
**Sent:** Wednesday, July 30, 2014 2:42 PM  
**To:** Seiler, K (ECY)  
**Cc:** Edmonson, Ava (ECY); Morris, Leslie (ECY)  
**Subject:** FW: Butcher's Data Review

Hi K, Here's the data that I referenced in our conversation. I just ran the MTCA numbers by TCP and they were correct.

Thank for any time you spend on this, networking with EPA. As I mentioned, we've already had WQ out there and TCP ranked the site a 1. I'm working with SWRO solid waste to see if there's another way to address concerns, and the site has been referred to L&I. It may be a good idea to refer the site to the air program as well, since we have concerns that they're burying asbestos.

Dee

---

**From:** Williams, Dee (ECY)  
**Sent:** Wednesday, July 30, 2014 2:24 PM  
**To:** Cason, Joe (ECY); Swanson, Nicky (ECY)  
**Cc:** Morris, Leslie (ECY); Edmonson, Ava (ECY)  
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Just wanted to give you a heads up. Let me know if you have any questions. It'd be great if one of you wanted to double-check the data... let me know.

Thanks. Dee

## Mullin, Michelle

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**From:** Mullin, Michelle  
**Sent:** Friday, August 08, 2014 9:48 AM  
**To:** Williams, Dee (ECY); Edmonson, Ava (ECY)  
**Subject:** RE: Butcher's

Hi Dee-

Thanks for the reply. Let's touch base on Tuesday. I will be in the office at 206-553-1616.

Take care,

### Michelle Mullin

#### PCB Coordinator

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**From:** Williams, Dee (ECY) [mailto:dewi461@ECY.WA.GOV]  
**Sent:** Thursday, August 07, 2014 9:21 PM  
**To:** Mullin, Michelle; Edmonson, Ava (ECY)  
**Subject:** RE: Butcher's

Hi Michelle,

Thanks for the email. I'm out of town at the moment. Would you mind if I gave you a call on Tuesday? Also, if you're interested, I could forward my immediate action letter and data packages for the site. We've also pulled together a work group representing various agencies (State Patrol, Water Quality, local Health Department, Labor & Industries) to discuss our work at the site. We have a conference call scheduled for Monday August 18th in the afternoon. Let me know if you'd like to hop in on that call with us; it will be the first time we've all met (virtually, anyway) to discuss Butchers.

Thanks,  
Dee Williams  
360-407-6348

---

**From:** Mullin, Michelle [Mullin.Michelle@epa.gov]  
**Sent:** Thursday, August 07, 2014 1:20 PM  
**To:** Edmonson, Ava (ECY); Williams, Dee (ECY)  
**Subject:** Butcher's

Hello-

I just left voicemails with both of you. I'm hoping we can touch base this week so that I can get a little more information about this site. Today I'm working at home and can be reached at 773-351-0606, tomorrow I will be in the office at 206-553-1616.

Thanks,

**Michelle Mullin**

PCB Coordinator

US EPA Region 10

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- The area of the ditch carries the highest concentration of mercury.
- Our water sample from the southwest corner doesn't book designate as dangerous. However, it is important to note that this water sample (taken from a sub-surface soil pocket, so I'm not sure if it is considered surface water or ground water) is above the MTCA groundwater clean-up standards for PCBs, arsenic, cadmium, chromium and lead. The PCB concentration was **6000x** higher than the clean up standard. The lead concentration was **almost 160x** higher.

I need to run the data by TCP to make sure I'm referencing the right MTCA numbers, but I'm fairly confident that this is accurate. As referenced in the data table, I used the "Method A Clean up Levels for Groundwater" and the "Method A Soil Cleanup Levels for Unrestricted Land Uses" which I think would be appropriate given the proximity to the Grays Harbor Wildlife Refuge, the nearby estuary, and residential uses.

Just wanted to give you a heads up. Let me know if you have any questions. It'd be great if one of you wanted to double-check the data... let me know.

Thanks. Dee



## Mullin, Michelle

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**From:** Mullin, Michelle  
**Sent:** Wednesday, May 07, 2014 2:12 PM  
**To:** Amon, Tyler  
**Subject:** FW: Butcher's Scrap and Metal PCB Contamination  
**Attachments:** Butcher's Scrap & Metal Inc WAR001957 Insp report 3-19-14.pdf; Butcher's Scrap and Metal\_PCB-1403066.pdf; Butcher's Scrap and Metal\_PCBs-1404046.pdf; ertsReferral\_647458\_update.pdf

## Michelle Mullin

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[www.epa.gov/region10/pcb.html](http://www.epa.gov/region10/pcb.html)

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**From:** Mullin, Michelle  
**Sent:** Monday, May 05, 2014 1:42 PM  
**To:** McFadden, Kelly  
**Subject:** FW: Butcher's Scrap and Metal PCB Contamination

## Michelle Mullin

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**From:** Kaufmann, Ron (ECY) [<mailto:rkau461@ECY.WA.GOV>]  
**Sent:** Monday, May 05, 2014 1:19 PM  
**To:** Mullin, Michelle  
**Subject:** Butcher's Scrap and Metal PCB Contamination

Hi Michelle,

Here are the documents on Butcher's Scrap and Metal. I've also attached Kevin Hancock's WQ report for more background information.

Thanks,

Ron Kaufmann

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